

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

Berger & Montague, P.C.
ATTORNEYS AT LAW

WRITER'S DIRECT DIAL NO.
(212) 849-7345

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WRITER'S EMAIL ADDRESS
danbrockett@quinnemanuel.com

VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007-1312

Re: *In re Commodity Exch., Inc., Gold Futures and Options Trading Litig.*, No. 14-MD-2548-VEC

Dear Judge Caproni:

We represent Plaintiffs in the above-captioned action and write to request permission to file under seal a letter apprising the Court of a material development involving individuals and entities implicated by the Government's investigation.

We make this request out of an abundance of caution and in light of the Government's sensitivity to the disclosure of information related to its investigation. Importantly in this regard, Plaintiffs' letter refers to individuals and entities that the public Government filings implicate, but do not disclose. Further, Plaintiffs' letter reflects information derived from documents produced by Deutsche Bank that were previously designated as "Confidential."

Given this, Plaintiffs respectfully request that this Court grant the request to file the letter under seal. *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006) (stating that although the public is presumptively entitled to access judicial records, this presumption must give way to "higher values" and "countervailing factors"). We will quickly confer with the Government and counsel for Deutsche Bank to prepare a redacted version of the letter to file publicly on the docket.

quinn emanuel urquhart & sullivan, llp

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Respectfully submitted,

/s/ Daniel L. Brockett

Daniel L. Brockett

QUINN EMANUEL URQUHART

& SULLIVAN LLP

51 Madison Ave., 22nd Floor

New York, NY 10010

/s/ Merrill G. Davidoff

Merrill G. Davidoff

BERGER & MONTAGUE, P.C.

1622 Locust Street

Philadelphia, PA 19103

Interim Co-Lead Counsel for the Proposed Class in Gold

cc: Counsel for Defendants and Counsel for U.S. Department of Justice (via ECF)